

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA)	
)	
V.)	No. 21 CR 19
)	
)	Hon. Judge Seeger
DAVID FOLEY)	
)	

UNOPPOSED MOTION TO EXTEND THE INITIAL PSR INTERVIEW DATE

The Defendant, David Foley, by his attorneys, Nishay K. Sanan and Cece White, hereby respectfully moves this court, to extend the time allotted by the local rules for Probation to conduct the intake interview” Mr. Foley states as follows:

1. On November 4, 2024, Mr. Foley was convicted of 2 counts of violations of securities laws and not guilty of 8 counts of wire fraud.
2. The Court set sentencing for March 12, 2024. The PSR is due by February 26, 2025, with recommendations.
3. The local rule requires that the intake interview for the PSR be completed within 14 days of the Court’s referral to the Probation Department.
4. Counsel has been in contact with Probation and have been working to schedule the interview. However, Counsel has a trial starting December 2, 2024, and the Probation Officer will be out of the office for the Holidays in mid-December.
5. Currently a date of January 10, 2024, works for both sides.
6. Counsel has spoken to the Government, and they have no objections to this motions.
7. Mr. Foley asks to continue the intake date to and include January 10, 2024.
8. This motion is not brought to cause delay to the proceedings.

WHEREFORE Mr. Foley asks to continue the intake date to and include January 10, 2024.

Respectfully submitted,

/s/ Nishay K. Sanan
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Respectfully submitted,

/s/ Cece White
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